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| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY | |
| Caption in Compliance with D.N.J. LBR 9004-1(b)(d) Robertson, Anschutz, Schneid, Crane & Partners, PLLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor Kimberly Wilson, Esq. 031441997 | CASE NO.: 24-20282-VFP CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan |
| In Re: Conrad Manisera, Debtor. | |

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2020-1 ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE #13), and states as follows:

1. Debtor, Conrad Manisera ("Debtor") filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on October 16, 2024
2. Secured Creditor holds a security interest in the Debtor's real property located at 113 Morris Avenue Denville, NJ 07834, by virtue of a Mortgage recorded on April 7, 2010 in book 21520 at page 531 of the Public Records of Morris County, NJ. Said Mortgage secures a Note in the amount of \$223,900.00.
3. The Debtor filed a Chapter 13 Plan on November 7, 2024.
4. The arrears proposed in the Plan are insufficient to satisfy the pre-petition arrears. The Secured Creditor estimates arrears will be \$3,732.18.
5. Secured Creditor objects to any plan that does not satisfy and pay the full pre-petition arrears subject to the filing of the claim and the regular monthly payment direct to lender.

6. As such, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan in the event the full proof of claim arrears are not being paid, and for such other and further relief as the Court may deem just and proper.

Robertson, Anschutz, Schneid, Crane & Partners,
PLLC
Authorized Agent for Secured Creditor
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Fairfield, NJ 07004
Telephone: 973-575-0707
Fax: 973-404-8886

By: /s/ Kimberly Wilson
Kimberly Wilson, Esquire
NJ Bar Number # 031441997
Email: kimwilson@raslg.com

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CERTIFICATION OF SERVICE

1. I, Devin Atchison, am the secretary/paralegal for Robertson, Anschutz, Schneid, Crane & Partners, PLLC, who represents Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2020-1 in the above-captioned matter.
2. On November 19, 2024, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below:

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN; Certificate of Service.

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date : 11/19/2024

Robertson, Anschutz, Schneid, Crane & Partners,
PLLC
Authorized Agent for Secured Creditor
130 Clinton Road, Suite 202, Lobby B
Fairfield, NJ 07004
Telephone: 973-575-0707
By: /s/ Devin Atchison

Email: datchison@raslg.com

| <u>Name and Address of Party Served</u> | <u>Relationship of Party to the Case</u> | <u>Mode of Service</u> |
|---|--|--|
| Andrew G. Greenberg Law Offices of Andrew G. Greenberg 4400 Route 9 South, Suite 1000 Freehold, NJ 07728 | Attorney for Debtor | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*) |
| Conrad Manisera 113 Morris Avenue Denville, NJ 07834 | Debtor | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*) |
| Marie-Ann Greenberg Chapter 13 Standing Trustee 30 Two Bridges Rd Suite 330 Fairfield, NJ 07004-1550 | Trustee | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*) |
| U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102 | U.S. Trustee | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*) |